

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:

JOSE L. ROMAN PADILLA

\* Debtor(s)

Case Number: 5-19-04446

Chapter: 13

**CERTIFICATE OF MAILING**

The undersigned employee in the office of:

Tullio DeLuca, Esquire

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hereby certifies that a copy of the attached Notice of Motion to Sell Free and Clear of All Liens, Charges and Encumbrances was mailed today to all parties named on the mailing list attached hereto by regular first class mail.

DATED: June 08, 2022

SIGNED: Lisa Manchak

TITLE: Legal Assistant

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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IN RE:	:	
JOSE L. ROMAN PADILLA	:	CASE 5-19-04446
a/k/a Jose Luis Roman Padilla	:	CHAPTER 13
a/k/a Jose Roman Padilla	:	
a/k/a Jose Roman	:	
Debtor(s)	:	

\*\*\*\*\*

JOSE L. ROMAN PADILLA	:	
Movant	:	
vs.	:	
PENNSYLVANIA HOUSING FINANCE	:	
AGENCY, LUZERNE COUNTY TAX	:	
CLAIM BUREAU, HAZELTON CITY	:	
AUTHORITY, MUNICIPAL AUTHORITY OF :	:	
HAZEL TWP., INTERNAL REVENUE	:	
SERVICE, PA DEPARTMENT OF REVENUE :	:	
and JACK N. ZAHAROPOULOS, ESQUIRE	:	
Respondents	:	

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NOTICE OF DEBTOR'S MOTION TO APPROVE PRIVATE SALE OF REAL AND  
PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CHARGES AND  
ENCUMBRANCES

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NOTICE IS HEREBY GIVEN THAT:

Debtor, Jose L. Roman Padilla resides at 645 Lincoln St., Hazleton, PA 18201 and seeks leave to sell real property of the above captioned case located at 645 Lincoln St., Hazleton PA 18201, along with personal property and fixtures to Wander Confesor Joa, for the sum of One Hundred Fifty Thousand (\$150,000.00) Dollars. The sale is to be free and clear of all liens, charges and encumbrances, with all valid liens and encumbrances to be paid at time of closing.

The Debtors further request the Court to allow distribution of the proceeds from the sale of real and personal property as follows:

1. Any out-of-pocket expenses advanced by Tullio DeLuca, Esquire in connection with the sale of the aforementioned property, and which have not been reimbursed at the time of settlement along with an attorney fee of \$1,500.00;
2. Any Notarization and/or incidental recording fees associated with the sale of the above property;
3. Realtors Commission of 6% percent;

4. Any transfer tax which is the responsibility of the seller herein;
5. Any unpaid real estate taxes and other municipal claims/liens arising from property;
- f. Payment in full to Pennsylvania Housing Finance Agency for both the first and second mortgages;
- g. That any other unpaid liens shall attach to the remaining sale proceeds;
- h. Debtor's exemption if any;
- I. The net sale proceeds in an amount to pay the balance owed to the Chapter 13 Trustee, if any, from the above sale shall be paid to Jack N. Zaharopoulos, Esq., Chapter 13 Trustee, for distribution to creditors in accordance with the Debtor's confirmed Plan

The Sale is not subject to higher and better offers.

Any inquiries regarding the sale and/or to request for copies of the motion or a time and date to examine the property prior to the sale, can be made directly to Debtor's Counsel, Tullio DeLuca, Esquire.

Hearing on any Answers or Objections will be heard on July 21, 2022 at 9:30am. If no objection and request for hearing are timely filed with the Bankruptcy Clerk, 197 South Main Street, Wilkes-Barre, PA 18701 to the sale of the aforementioned real and personal property on the above terms and conditions on or before **June 29, 2022**, the Court may grant the relief requested. If you desire to contest this matter, file a written objection in the form of responsive pleading and request a hearing with a copy to Tullio DeLuca, Esquire at the address below: Any filing must conform to the Rule of Bankruptcy Procedures unless the Court determines otherwise.

Date of Notice: June 8, 2022

Tullio DeLuca, Esquire  
381 N 9<sup>th</sup> Avenue  
Scranton, PA 18504  
(570) 347-7764

BEST BUY CREDIT SERVICES  
PO BOX 790441  
ST. LOUIS, MO 63179-0441

CAPITAL ONE  
PO BOX 30285  
SALT LAKE CITY, UT 84130-0285

CAPITAL ONE BANK (USA), NA  
BY AMERICAN INFOSOURCE  
PO BOX 71083  
CHARLOTTE, NC 28272-1083

CAVALRY SPV I, LLC  
500 SUMMIT LAKE DR., SUITE 400  
VALHALLA, NY 10595-2321

Jack N. Zaharopoulos  
Chapter 13 Trustee  
P.O. Box 6008  
Memphis, TN 38101-6008

LEON P. HALLER  
PURCELL KRUG AND HALLER  
1719 NORTH FRONT STREET  
HARRISBURG, PA 17102

PHFA  
211 N. FRONT ST.  
HARRISBURG, PA 17101-1466

PHFA  
PO BOX 15057  
HARRISBURG, PA 17105-5057

PHFA-HEMAP  
211 NORTH FRONT ST  
PO BOX 15206  
HARRISBURG, PA 17105-5206

PRA RECEIVABLES MANAGEMENT, LLC  
PO BOX 41021  
NORFOLK, VA 23541-1021

SYNCHRONY BANK  
C/O PRA RECEIVABLES MANAGEMENT, INC.  
PO BOX 41021  
NORFOLK, VA 23541

SYNCHRONY BANK/JC PENNEY  
ATTN: BANKRUPTCY DEPT  
PO BOX 965060  
ORLANDO, FL 32896-5060

US BANK, NA, TRUSTEE FOR  
PENNSYLVANIA HOUSING FINANCE  
211 NORTH FRONT STREET  
HARRISBURG, PA 17101-1406

UNITED STATES TRUSTEE  
228 WALNUT ST., SUITE 1190  
HARRISBURG, PA 17101

VERIZON  
BY AMERICAN INFOSOURCE AS AGENT  
PO BOX 4457  
HOUSTON, TX 77210

JAMES WARMBRODT, ESQ.  
701 MARKET ST., SUITE 5000  
PHILADELPHIA, PA 19106